

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**ROBIN JOACHIM DARTELL, et al.,
Individually and on Behalf of All Others
Similarly Situated**

Plaintiff,

Civil Action No. 14-CV-3620-JMV

VS.
TIBET PHARMACEUTICALS, INC., et al
Defendant.

**P. VAN HOVE BVBA, PASCAL VAN HOVE
GCV, JOHN THOLLON, MICHAEL ZABINSKI,
JEAN DOYLE, AND MARK LAROSA,
INDIVIDUALLY AND ON BEHALF OF ALL
OTHERS SIMILARLY SITUATED,**

Plaintiffs,

CASE No.: 2:11-cv-2164-JMV

vs.
**UNIVERSAL TRAVEL GROUP, INC.,
JIANGPING JIANG, YIZHAO ZHANG, JIANG
XIE, JIDUAN YUAN, LAWRENCE LEE,
LIZONG WANG, DAVID T. SVOBODA, AND
ACQUAVELLA, CHIARELLI, SHUSTER & CO.,
LLP, ACQUAVELLA, CHIARELLI, SHUSTER,
BERKOWER & CO., LLP, JOSEPH P.
ACQUAVELLA, SANTO CHIARELLI, SAMUEL
SHUSTER, AND MAURICE BERKOWER,**

Defendants.

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO SEAL

Before the Court is Plaintiffs' Motion to Seal. The Court, having reviewed Plaintiffs' Motion to Seal, and the Court finding that:

- (a) The insurance policies referenced in Plaintiffs' Motion to Seal contain confidential information concerning the amount of the policies;
- (b) It is important not to have the insurance policies publicly filed, as doing so could disrupt arms-length negotiated settlements;
- (c) The supplemental agreements concerning the proposed settlements referenced in Plaintiffs' Motion to seal contain provisions concerning the number of shares of stock that would have to opt-out of the respective settlements such that the respective settling defendants would be able to exercise the right to terminate the settlement; and
- (d) It is important not to have the supplemental agreements filed publicly, as doing so could disrupt an arms-length negotiated settlement.

IT IS ORDERED that the Plaintiffs may file under seal the documents referenced in their Motion to Seal.

IT IS FURTHER ORDERED that the above-referenced documents shall be maintained under seal by the Clerk of the Court.

Dated: _____, ____ 201____

SO ORDERED:

HON. JOHN MICHAEL VASQUEZ
UNITED STATES DISTRICT JUDGE